

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

FILED
RICHARD W. NAGEL
CLERK OF COURT

2023 NOV -8 PM 2:57

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RICHARD CROSBY,
a/k/a "Richard Williams,"
a/k/a "Chris Miller,"

Defendant.

CASE NO.

1:23CR 111

JUDGE J. HOPKINS

INDICTMENT

18 U.S.C. § 1343
42 U.S.C. § 408(a)(7)(B)
18 U.S.C. § 1028A

THE GRAND JURY CHARGES:

COUNTS 1-13
(Wire Fraud)

1. RICHARD CROSBY was admitted to practice law in Ohio on or about May 5, 2014.
2. On or about November 6, 2020, the Cincinnati Bar Association filed a complaint against CROSBY with the Board of Professional Conduct of the Supreme Court of Ohio (case 20-065). The complaint alleged that CROSBY violated numerous rules of professional conduct when he was employed at a law firm in Cincinnati from April 2018 to September 2019.
3. On or about April 22, 2021, the Board of Professional Conduct entered an order staying the disciplinary proceedings because CROSBY had indicated his intent to resign from the practice of law.
4. On or about June 24, 2021, CROSBY was indicted in Hamilton County with Felony Theft and Unauthorized Use of Property (case B 2103088). The charges alleged that CROSBY stole client funds while acting in his capacity as an attorney.

5. On or about September 27, 2021, the Ohio Supreme Court issued an order accepting CROSBY's resignation from the practice of law with disciplinary action pending.
6. On or about November 8, 2021, CROSBY was indicted in Hamilton County with theft and telecommunications fraud (case B 2105212).
7. On or about May 5, 2022, CROSBY was arrested in connection with both of his pending Hamilton County criminal indictments. He pled guilty in both cases on or about May 26, 2023. On or about June 27, 2023, he was sentenced to probation in both cases.

The Scheme

8. From in or about April 2021 to in or about October 2023, the defendant, RICHARD CROSBY, devised and intended to devise a scheme to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises.

Manner and Means

9. It was part of the scheme that on or about April 26, 2021, CROSBY established the email account richardcwilliamsesq@gmail.com.
10. It was part of the scheme that on or about June 1, 2021, CROSBY applied for a job as an attorney at "Law Firm #1," a law firm located in or about Washington, D.C. CROSBY used the alias "Richard Williams" and provided a resume with falsified credentials. Based on this false information, the firm hired him.
11. It was part of the scheme that in or about September to October 2022, CROSBY applied for a job as an attorney with "Law Firm #2," a law firm located in or about Miami, Florida. CROSBY used the alias "Richard Williams" and provided a resume with falsified credentials. Based on this false information, the firm hired him.

12. It was part of the scheme that on or about October 12, 2022, CROSBY sent an email to a recruiter for Law Firm #2 in which he falsely claimed to be a member of the bar in New York and the District of Columbia.
13. It was part of the scheme that on or about October 17, 2022, CROSBY sent an email to Law Firm #2. He attached a Form I-9 in which he falsely claimed that his Social Security number was xxx-xx-9414 and his passport number was xxxxx3183. He also attached an IRS Form W-4, in which he falsely claimed that his Social Security number was xxx-xx-9414. These numbers belong to a different person, with whom CROSBY was personally acquainted.
14. It was part of the scheme that in or about July 2023, CROSBY applied for a job as an attorney with “Law Firm #3,” a law firm located in or about Los Angeles, California. CROSBY used the alias “Richard Williams” and provided falsified credentials.
15. It was part of the scheme that in or about July 2023, CROSBY applied for a job as an attorney with “Law Firm #4,” a law firm located in or about Coral Gables, Florida. CROSBY used the alias “Richard Williams” and provided falsified credentials.
16. It was part of the scheme that on or about July 25, 2023, CROSBY sent an email to Law Firm #4 to negotiate a job offer.
17. It was part of the scheme that on or about July 26, 2023, CROSBY sent an email to Law Firm #4. He attached a forged document that purported to be a screen shot from the District of Columbia Bar website to falsely prove his membership. He also attached a biography in which he falsely stated that he held a J.D. degree from the University of Michigan and that he was a member of the bar in New York and the District of Columbia.

18. It was part of the scheme that on or about August 29, 2023, CROSBY applied for a job as an attorney with “Law Firm #5,” a law firm located in or about Detroit, Michigan. CROSBY used the alias “Richard Williams” and provided falsified credentials.
19. It was part of the scheme that on or about August 31, 2023, CROSBY sent an email to Law Firm #5 to negotiate terms of employment.
20. It was part of the scheme that on or about September 1, 2023, CROSBY sent an email to Law Firm #5 in which he attached a screen shot from the District of Columbia Bar website to falsely prove his membership. The screen shot shows information for a person whose name includes “Richard” and who is a member of the District of Columbia Bar.
21. It was part of the scheme that on or about September 26, 2023, CROSBY applied for a job as an attorney with “Law Firm #6,” a law firm located in or about Irvine, California. CROSBY used the alias “Christopher ‘Rich’ Miller-Williams, Esq.” and provided falsified credentials.
22. It was part of the scheme that on or about October 9, 2023, CROSBY used his alias to sign an offer letter with Law Firm #6 in which he was offered a salary of \$250,000 per year. He returned the letter to the firm via email.
23. It was part of the scheme that on or about October 23, 2023, CROSBY emailed an IRS Form W-9 to Law Firm #6. In the form, he falsely claimed that his name was Chris Miller and his Social Security number was xxx-xx-6139. This number belongs to a different person.

Execution of the Scheme

24. On or about the dates listed below, in the Southern District of Ohio and elsewhere, the defendant, RICHARD CROSBY, for the purpose of executing the scheme described

above, did transmit and cause to be transmitted in interstate commerce, by means of wire communications, certain signs, signals, pictures and sound described below for each count, each transmission constituting a separate count:

COUNT	DATE	DESCRIPTION
1	June 1, 2021	Email to Law Firm #1
2	October 12, 2022	Email to recruiter for Law Firm #2
3	October 17, 2022	Email to Law Firm #2
4	July 17, 2023	Email to Law Firm #3
5	July 19, 2023	Email to Law Firm #3
6	July 25, 2023	Email to Law Firm #4
7	July 26, 2023	Email to Law Firm #4
8	August 29, 2023	Online job application to Law Firm #5
9	August 31, 2023	Email to Law Firm #5
10	September 1, 2023	Email to Law Firm #5
11	September 26, 2023	Online job application to Law Firm #6
12	October 9, 2023	Email to Law Firm #6
13	October 23, 2023	Email to Law Firm #6

In violation of 18 U.S.C. § 1343.

COUNTS 14-16
(Social Security number fraud)

25. The Grand Jury realleges and incorporates by reference Paragraphs 1-24 as though set forth in full herein.
26. On or about the dates listed below, in the Southern District of Ohio and elsewhere, the defendant, RICHARD CROSBY, for the purpose of obtaining for himself and any other person anything of value from any person, and for any other purpose, did, with intent to deceive, falsely represent a number to be the social security account number assigned by the Commissioner of Social Security to him, when in fact, such number was not the social security account number assigned by the Commissioner of Social Security to him:

COUNT	DATE	DESCRIPTION
14	October 17, 2022	Form I-9 for Law Firm #2
15	October 17, 2022	Form W-4 for Law Firm #2
16	October 23, 2023	Form W-9 for Law Firm #6

In violation of 42 U.S.C. § 408(a)(7)(B).

COUNTS 17-19
(Aggravated identity theft)

27. The Grand Jury realleges and incorporates by reference Paragraphs 1-26 as though set forth in full herein.
28. On or about the dates listed below, in the Southern District of Ohio and elsewhere, the defendant, RICHARD CROSBY, during and in relation to any felony violation enumerated in 18 U.S.C. § 1028A(c), did knowingly transfer, possess, and use without lawful authority, a means of identification of another person:

COUNT	DATE	DESCRIPTION
17	October 17, 2022	Form I-9 for Law Firm #2
18	October 17, 2022	Form W-4 for Law Firm #2
19	September 1, 2023	Email to Law Firm #5

In violation of 18 U.S.C. § 1028A

A TRUE BILL.

/S/

FOREPERSON

**KENNETH L. PARKER
UNITED STATES ATTORNEY**



**TIMOTHY LANDRY, MA 669554
SPECIAL ASSISTANT UNITED STATES ATTORNEY**